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7 Telephone: (310) 979-7561
8 Facsimile: (310) 979-8701
9 *Attorneys for Defendant*
10 *Suzuki Enterprises, Inc. Profit Sharing Plan*

11 ROBERT A. RABBAT, ESQ.
12 Nevada Bar No. 12633
13 Email: rrabbat@enensteinlaw.com
14 **ENENSTEIN RIBAKOFF LAVIÑA & PHAM**
15 3960 Howard Hughes Parkway, Suite 280
16 Las Vegas, NV 89169
17 Telephone: (702) 468-0808
18 Facsimile: (702) 920-8228
19 *Attorneys for Defendant*
20 *Suzuki Enterprises, Inc. Profit Sharing Plan*

21 **UNITED STATES DISTRICT COURT**

22 **DISTRICT OF NEVADA**

23 SHIGE TAKIGUCHI, et. al,
24 Individually and On Behalf of All
25 Others Similarity Situated,

26 Plaintiffs,

27 v.

28 MRI INTERNATIONAL, INC.,
EDWIN J. FUJINAGA, JUNZO
SUZUKI, PAUL MUSASHI
SUZUKI, LVT, INC., dba STERLING
ESCROW, and DOES 1-500,

Defendants.

Case No.: 2:13-cv-01183-HDM-VCF

**STIPULATION AND ORDER RE
PAYMENT OF ATTORNEYS
FEES AND COSTS INCURRED
BY SUZUKI ENTERPRISES,
INC., PROFIT SHARING PLAN
DURING DECEMBER 2016**

1 WHEREAS Defendant Suzuki Enterprises, Inc. Profit Sharing Plan (the
2 "Plan") and Plaintiffs are collectively referred to herein as the "Parties";

3 WHEREAS on December 2, 2014, the Court issued its order [550] ("Order
4 re Fees") approving the Stipulation and Order re Payment of Attorneys' Fees [549]
5 ("Stipulation re Fees") incurred by the Plan from Plan funds presently subject to
6 the preliminary injunction [183] issued by this Court;

7 WHEREAS the Order re Fees expressly provides for payment of fees
8 incurred by the Plan via stipulation;

9 WHEREAS the Plan incurred legal fees for, among other things, developing
10 and researching its anticipated defenses, preparing initial disclosures and
11 negotiating a settlement with Plaintiffs;

12 WHEREAS the Plan has incurred legal fees for the month of December
13 2016 in the amount of \$57,585.41, payable as follows:

- 14 • \$30,956.50 payable to Foundation Law Group, LLP, lead counsel for
15 the Plan;
- 16 • \$13,953.75 payable to Brucker & Morra, APC, counsel for the Plan
17 focusing on ERISA issues; and
- 18 • \$12,675.16 payable to Enenstein Ribakoff LaViña & Pham, local
19 counsel for the Plan focusing on, among other things, preparing Initial
20 Disclosures;

21 WHEREAS, the Plan's redacted invoices are attached hereto as Exhibit "A";

22 WHEREAS the Parties have communicated a mutual desire to avoid the
23 necessity of a formal motion for attorneys' fees for payment of the fees incurred by
24 the Plan for the month of December 2016;

25 NOW, therefore, the Parties stipulate that:

- 26 1. Payment of the Plan's legal fees and expenses for the month of December
27 2016, in the total amount of \$57,585.41, shall be made from the funds
28 held by LPL Financial for the benefit of the Plan;

2. \$30,956.50 of the funds held by LPL Financial for the benefit of the Plan shall be unfrozen and released from the preliminary injunction [183] and paid to Foundation Law Group LLP;
 3. \$13,953.75 of the funds held by LPL Financial for the benefit of the Plan shall be unfrozen and released from the preliminary injunction [183] and paid to Brucker & Morra, APC;
 4. \$12,675.16 of the funds held by LPL Financial for the benefit of the Plan shall be unfrozen and released from the preliminary injunction [183] and paid to Enenstein Ribakoff LaViña & Pham;
 5. The remaining funds held by LPL Financial for the benefit of the Plan shall remain frozen and subject to the preliminary injunction [183] pending a further application for payment of attorneys' fees and expenses; and
 6. Payment of attorneys' fees and expenses for the month of December 2016 (per items 2, 3 and 4 above) shall be made from cash on hand, to the extent available and capable of satisfying such fees and expenses. If assets, such as mutual funds, need to be liquidated in order to satisfy such fees and expenses, then LPL Financial shall exercise its discretion on liquidating assets and shall communicate its intent to counsel for the Plan and for Plaintiffs.

Respectfully submitted,

DATED this 9th day of January 2017

DATED this 9th day of January 2017

**MANNING & KASS ELLROD
RAMIREZ, TRESTER LLP**

By: /s/ James E. Gibbons
James E. Gibbons
Attorneys for Plaintiffs

ENENSTEIN RIBAKOFF LAVIÑA & PHAM

By: /s/ Robert A. Rabbat
Robert A. Rabbat
Attorneys for Defendant
Suzuki Enterprises, Inc., Profit
Sharing Plan

1 DATED this 9th day of January 2017

DATED this 9th day of January 2017

2 **LAW OFFICES OF ROBERT W.**
3 **COHEN, A.P.C.**

FOUNDATION LAW GROUP LLP

4 By: : /s/ Robert W. Cohen
5 Robert W. Cohen
6 *Attorneys for Plaintiffs*

By: /s/ Gregg Zucker
Gregg Zucker
Attorneys for Defendant
Suzuki Enterprises, Inc., Profit
Sharing Plan

9
10 **ORDER**

11 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

12 DATED this 10th day of January, 2017.

13
14 
15 _____
United States Magistrate Judge

1 **CERTIFICATE OF SERVICE**

2 Pursuant to Fed.R.Civ.P. 5(b), I hereby certify that on the 9th day of
3 January, 2017, I served a true and correct copy of the foregoing **STIPULATION**
4 **AND ORDER RE PAYMENT OF ATTORNEYS FEES AND COSTS**
5 **INCURRED BY SUZUKI ENTERPRISES, INC., PROFIT SHARING PLAN**
6 **DURING DECEMBER 2016** via mandatory electronic service via Pacer. Parties
7 may access this filing through the Court's CM/ECF.

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9 _____
10 /s/ Michelle Choto
11 _____
12 Michelle Choto

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Exhibit A – The Plan’s Redacted Invoices

**INVOICE**

Invoice # 1260
Date: 12/30/2016

Suzuki Enterprises, Inc. Profit Sharing Plan

1043-00001-Suzuki Enterprises, Inc. Profit Sharing Plan/Suzuki Enterprises, Inc. Profit Sharing Plan v. Shige Takiguchi et al.

Suzuki Enterprises, Inc. Profit Sharing Plan v. Shige Takiguchi et al.

Type	Date	Attorney	Description	Quantity	Rate	Total
Service	12/01/2016	Gregg Zucker	Revise Pro Hac Vice Application; obtain Certificate of Standing from Cal Bar; correspondence regarding Application; finalize same.	0.50	\$595.00	\$297.50
Service	12/01/2016	Caroline Magbojos	Correspondence with Gregg re: bill	0.10	\$150.00	\$15.00
Service	12/02/2016	Gregg Zucker	Review court order re jury trial; strategize regarding upcoming items; conference with opposing counsel regarding same and settlement issues; telephone conferences with local counsel and Mr. Morgan regarding settlement issues, scheduling and trial; obtain notarization on pro hac vice application; prepare numerous correspondence regarding same; review correspondence regarding settlement; correspondence to client regarding same; correspondence to/ from mediator regarding scheduling; strategize regarding potential continuance; strategize regarding potential defenses.	4.20	\$595.00	\$2,499.00
Service	12/04/2016	Gregg Zucker	Strategize regarding potential continuance, settlement approach with client decisionmakers, potential defenses and prospective trial preparation.	0.60	\$595.00	\$357.00
Service	12/05/2016	Caroline Magbojos	Download documents from Ms. Taenaka at Robert Cohen Law; correspondence with Gregg and review documents	0.60	\$150.00	\$90.00

Service	12/05/2016	Gregg Zucker	Preliminary review of tracing documents and correspondence regarding same; strategize regarding same; strategize regarding potential defenses.	0.60	\$595.00	\$357.00
Service	12/06/2016	Gregg Zucker	Numerous correspondence to client regarding settlement; correspondence to opposing counsel regarding tracing documents and continuance; strategize regarding same; telephone conference with local counsel regarding same; correspondence and telephone conference with all counsel regarding setting a call with the court; strategize regarding same; review and prepare correspondence regarding coverage issues.	3.20	\$595.00	\$1,904.00
Service	12/07/2016	Gregg Zucker	Review court order on telephone conference re continuance; calendar same; telephone conference with opposing counsel regarding settlement communications; numerous correspondence to client and Mr. Bartlett regarding same; correspondence regarding Initial Disclosures; strategize regarding response to Complaint; register for ECF filings.	2.00	\$595.00	\$1,190.00
Service	12/08/2016	Gregg Zucker	Review correspondence from Mr. Bartlett regarding settlement issues; telephone conference with Mr. Morgan regarding same; strategize regarding same; strategize regarding accounting of funds at LPL; correspondence regarding same; correspondence to plaintiff's counsel regarding settlement offer; correspondence to client regarding same; review tracing documents and complaint; correspondence to ERISA counsel regarding potential defenses; strategize regarding same; correspondence regarding insurance issues.	2.30	\$595.00	\$1,368.50
Service	12/09/2016	Gregg Zucker	Review briefing in opposition to the MSJ; telephone conference with and correspondence from/to opposing counsel regarding insurance documentation; numerous correspondence regarding ERISA issues; strategize regarding same	2.20	\$595.00	\$1,309.00

			and potential defenses; correspondence and telephone conference with LPL Financial regarding amount of assets in Plan; strategize regarding settlement issues.			
Service	12/12/2016	Gregg Zucker	Correspondence to client regarding account balance in plan and permission to obtain information on same from LPL; correspondence to/ from client regarding settlement issues; strategize regarding same.	0.30	\$595.00	\$178.50
Service	12/13/2016	Gregg Zucker	Prepare for and telephone conference with court regarding continuance; strategize regarding settlement issues; strategize regarding Reno v. LV venue; numerous correspondence regarding same; numerous correspondence regarding Initial Disclosures; review same; telephone conference with Mr. Morgan regarding settlement issues and response to complaint; correspondence to plaintiff's counsel regarding settlement issues; correspondence to insurance broker regarding policies; telephone conference with LPL regarding assets and potential liquidation; review and prepare correspondence regarding same; telephone conference with Mr. Bartlett regarding same; correspondence to client regarding same; correspondence to client regarding settlement approach; strategize regarding trial and deposition witnesses; correspondence to client regarding same; correspondence to Ms. Sasser regarding ERISA issues.	2.90	\$595.00	\$1,725.50
Service	12/14/2016	Caroline Magbojos	Download files from Paul Hastings; correspondence with Gregg and Mr. Jones re: access to documents	0.60	\$150.00	\$90.00
Service	12/14/2016	Gregg Zucker	Review correspondence regarding settlement demand; telephone conference with Mr. Cohen regarding same; numerous correspondence regarding settlement issues; correspondence to client regarding assessment of case; strategize regarding same; strategize regarding tracing issues;	3.70	\$595.00	\$2,201.50

			review documents regarding same; correspondence regarding same; telephone conference with Mr. Rabat regarding same; correspondence to ERISA counsel regarding ERISA issues.			
Service	12/16/2016	Gregg Zucker	Numerous telephone conferences and correspondence regarding settlement, tax issues, ERISA rules, pre-2008 contributions, and liquidation of assets; strategize regarding same.	1.80	\$595.00	\$1,071.00
Service	12/18/2016	Gregg Zucker	Strategize regarding ERISA issues; review research/caselaw regarding same; review and strategize regarding correspondence from opposing counsel regarding fraudulent transfer and tracing issues; correspondence to ERISA counsel regarding same.	0.90	\$595.00	\$535.50
Service	12/19/2016	Gregg Zucker	Telephone conference with ERISA counsel regarding potential defenses, legal issues and strategy; review caselaw regarding same; strategize regarding potential tax implications and settlement issues; review and revise stipulation re liquidation; correspondence regarding same.	2.00	\$595.00	\$1,190.00
Service	12/20/2016	Gregg Zucker	Research, strategize and telephone conference with ERISA counsel regarding ERISA and tax issues; numerous correspondence to/from Mr. Morgan regarding alleged Ponzi scheme issues; telephone conference with Plaintiffs' counsel regarding potential settlement; prepare correspondence to Plaintiffs' counsel regarding same; strategize regarding same; telephone conference with Plaintiffs' counsel regarding liquidation stipulation; revise same; correspondence to Plaintiffs' counsel regarding same; correspondence to LPL regarding same; review tracing documents; review court order regarding scheduling; calendaring same; review Munoz deposition; review MSJ papers regarding evidence for alleged starting date for alleged Ponzi scheme; strategize regarding response to complaint; review prior	6.30	\$595.00	\$3,748.50

			answers by Suzuki; strategize regarding potential motion to dismiss arguments; research Nevada law on ERISA related issues under state law.	
Service	12/21/2016	Gregg Zucker	Telephone conferences with Mr. Morgan, ERISA counsel, and Plaintiffs' counsel regarding alleged Ponzi scheme issues, tracing issue and ERISA issues; strategize regarding same; extensive correspondence to client regarding same; review research regarding ERISA issues; correspondence to Plaintiffs' counsel regarding liquidation and settlement; correspondence and telephone call to LPL regarding liquidation; strategize regarding same; review additional testimony from Munoz; correspondence regarding same; review correspondence from Plaintiffs' counsel regarding ERISA cases; review correspondence from ERISA lawyers distinguishing same; strategize regarding same; correspondence to Plaintiffs' counsel regarding same.	4.30 \$595.00 \$2,558.50
Service	12/22/2016	Gregg Zucker	Research regarding ERISA issues; prepare numerous correspondence regarding same and settlement; telephone conferences with Plaintiffs' counsel regarding same; telephone conference with ERISA counsel and local counsel regarding same; strategize regarding same; correspondence to client regarding same; correspondence regarding liquidation and assets in plan.	5.90 \$595.00 \$3,510.50
Service	12/23/2016	Gregg Zucker	Strategize regarding settlement discussions; telephone conference with Plaintiffs' counsel regarding same; prepare and review correspondence to/from, and telephone conference with, LPL regarding liquidation; strategize regarding same; coordinate Initial Disclosures; memorialize settlement and correspondence regarding extension request; inform team and client regarding settlement; strategize regarding court approval.	2.30 \$595.00 \$1,368.50

Service	12/26/2016	Gregg Zucker	Telephone conferences with Plaintiffs' counsel regarding settlement process; prepare settlement agreement; correspondence to Plaintiffs' counsel and ERISA lawyers regarding same; strategize regarding same.	1.70	\$595.00	\$1,011.50
Service	12/27/2016	Gregg Zucker	Review revisions to draft settlement agreement; correspondence to ERISA lawyers and Plaintiffs' counsel regarding same; strategize regarding same; review correspondence regarding class settlement issues; strategize regarding same.	1.00	\$595.00	\$595.00
Service	12/28/2016	Gregg Zucker	Telephone conference with ERISA lawyers regarding escrow and other settlement issues; correspondence to/from Plaintiffs' counsel regarding same; strategize regarding same.	1.10	\$595.00	\$654.50
Service	12/29/2016	Gregg Zucker	Strategize regarding settlement and class issues; strategize regarding timing of same.	0.20	\$595.00	\$119.00
Service	12/30/2016	Gregg Zucker	Telephone conference with ERISA counsel regarding Plan issues and settlement agreement revisions; strategize regarding same; redline same; correspondence to/from LPL regarding status of liquidation and funds in Plan.	1.70	\$595.00	\$1,011.50
				Subtotal	\$30,956.50	
				Total	\$30,956.50	

Statement of Account

Outstanding Balance	New Charges	Payments Received	Total Amount Outstanding
(\$0.00)	+ \$30,956.50) - (\$0.00) =	\$30,956.50

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1260	12/30/2016	\$30,956.50	\$0.00	\$30,956.50
Outstanding Balance				\$30,956.50
Total Amount Outstanding				\$30,956.50

Payment is due upon receipt unless otherwise agreed in writing.

Remittance Advice

Checking Information

Remit checks to: Foundation Law Group LLP
445 S. Figueroa Street, Suite 3100
Los Angeles, CA 90071

Wire Transfer Information

Bank Name/Address: Chase Bank
749 Foothill Blvd.
La Canada, CA 91011

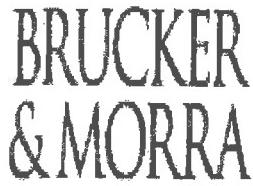
Bank ABA/Routing #: 322271627

Name/Account #: Foundation Law Group LLP
Account Number- 525388950

SWIFT: CHASUS33

Please include the invoice number 1260 as an additional reference so we may accurately identify and apply your payment.

Please provide adequate payment to cover the wire fees assessed by your financial institution.



A PROFESSIONAL CORPORATION

BRUCKER & MORRA, APC
10866 Wilshire Blvd., 10th Floor
Los Angeles, CA 90024
Ph: 310-475-7540 • F: 310-470-4806

Invoice Number Sample
 December 29, 2016

Our Identifying Code for this Matter	FOUN4-11	MJS
Billing Cut Off	Dec 30/16	

Name of Matter:	PROFIT SHARING PLAN			
DATE	ATTY	SERVICES RENDERED	HOURS	AMOUNT
12/09/16	AMB	Conference with Meredith regarding ERISA Defense to claims.	0.50	325.00
12/09/16	MJS	Legal research regarding ERISA pre-emption to law suit and anti-assignment rules. Various email to Gregg regarding ERISA preemption.	1.50	727.50
12/14/16	MJS	Respond to Greg regarding trustee removal issue and review of documents regarding same.	0.50	242.50
12/15/16	AMB	Telephone conferences with Client regarding claims vs. plan	0.75	487.50
12/15/16	MJS	Legal research regarding tracing of employer contributions and ponzi scheme. Telephone conference with Gregg regarding erisa protection, [REDACTED] and plan merger.	1.50	727.50
12/15/16	MJS	Emails with Gregg regarding tortfeasors and protection by ERISA. Research regarding protection of assets and segregation of assets based on date of ponzi scheme. Email to Gregg regarding review of [REDACTED] [REDACTED]	1.25	606.25
12/16/16	MJS	Email to Greg regarding [REDACTED] proceeds from plan as settlement. Telephone conference with Greg and Alex regarding ERISA issues.	1.00	485.00

Invoice Number	Sample	Page 2		December 29, 2016
12/19/16 AMB	Telephone conferences with Client regarding claims vs. plan. Legal research re same	0.75	487.50	
12/19/16 MJS	Emails to Greg regarding ERISA preemption and asset issue. Telephone conference with Greg and Alex Brucker regarding ERISA Preemption and issue with earnings on contribution. Research case law regarding ERISA preemption and email research to Gregg. Email to Gregg regarding additional tax questions.	2.00	970.00	
12/19/16 MLM	Work regarding coordination of documents and files for Brucker	1.50	262.50	
12/20/16 AMB	Work regarding preemption issue and emails and telephone conferences with Client and Sesser	0.50	325.00	
12/20/16 MJS	Email to Gregg regarding additional tax questions. Telephone conference with Gregg regarding ERISA preemption. Research regarding MVRA and [REDACTED] case.	1.00	485.00	
12/21/16 MJS	Research regarding each case [REDACTED] raised and comments regarding why [REDACTED] not apply. Email to Greg regarding [REDACTED] case and research regarding same. Research regarding tracing assets.	1.50	727.50	
12/22/16 MJS	Legal research regarding case for ERISA preemption regarding: [REDACTED] Stern and opposition.	1.00	485.00	
12/26/16 MJS	Review and revise settlement agreement.	1.00	485.00	
12/27/16 AMB	Work regarding review settlement agreement and analysis	1.00	650.00	
12/28/16 AMB	Work regarding continued review of agreement and telephone conferences with Sesser and Client regarding same.	1.25	812.50	
12/28/16 MJS	Discuss with Alex Brucker ERISA language for settlement agreement and histroy of plan.	0.50	242.50	
12/29/16 AMB	Work regarding revisions to settlement agreement and review ERISA protection issues and review Plan annual reports	1.25	812.50	
12/30/16 AMB	Complete agreement revisions and review sub-trust provisions. Telephone conferences with Client and Sesser regarding same	3.25	2,112.50	

Invoice Number	Sample	Page 3	December 29, 2016
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12/30/16 MJS	Work regarding subtrust language and additional revisions with Brucker.	2.00	970.00
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	Total for Professional Services	25.50	\$13,428.75
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Summary	Hours	Rate	Amount
Alex M Brucker	9.25	\$650.00	\$6,012.50
Meredith J. Sesser	14.75	\$485.00	\$7,153.75
Maria Lagman Mapoy	1.50	\$175.00	\$262.50

COSTS ADVANCED

12/09/16	Lexis computer research	275.00
12/19/16	Lexis computer research	250.00
	Total Advanced Costs	\$525.00

TOTAL CURRENT FEES AND COSTS	\$13,953.75
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Previous Balance	\$485.00
Previous Payments	
12/16/16	\$485.00

BALANCE DUE NOW	\$13,953.75
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Aging:	<=30	<=60	<=90	<=120	> 120
	\$13,953.75	\$0.00	\$0.00	\$0.00	\$0.00

* * * BALANCE DUE UPON RECEIPT * * *

Enenstein Ribakoff LaViña & Pham

3960 Howard Hughes Pkwy, Suite 280
 Las Vegas, NV 89169
 Telephone: (702) 468-0808
 Fax: (702) 920-8228

Suzuki Enterprises, Inc. Profit Sharing Plan

December 28, 2016
 Invoice No. 20656

Client: Suzuki Enterprises, Inc. Profit Sharing Plan

Matter ID: NV 400012.001 Suzuki adv. Takiguchi

For Services Rendered Through 12/28/2016**Fees**

Date	Timekeeper	Description	Hours	Amount
12/2/2016	RAR	REVIEW COURT ORDER GRANTING STIPULATION FOR PAYMENT OF ATTORNEYS FEES; EMAIL CO-COUNSEL RE SAME	0.20	\$99.00
12/2/2016	RAR	FINALIZE AND FILE PRO HAC APPLICATION FOR GREGG ZUCKER	0.30	\$148.50
12/2/2016	RAR	REVIEW MINUTE ORDER BY COURT SETTING DATE FOR PRE-TRIAL SUBMISSIONS AND CONFIRMING TRIAL DATE	0.20	\$99.00
12/2/2016	RAR	REVIEW LOCAL RULES RE PRE-TRIAL SUBMISSIONS, INCLUDING JOINT PRE-TRIAL REPORT	0.20	\$99.00
12/2/2016	RAR	ADDRESS POTENTIAL NEED FOR TRIAL CONTINUANCE; REVIEW CORRESPONDENCE WITH CLIENT RE SAME	0.40	\$198.00
12/2/2016	RAR	REVIEW COURT ORDER RE JURY INSTRUCTIONS	0.20	\$99.00
12/5/2016	RAR	REVIEW NOTIFICATION RE MOTION FOR ATTORNEYS FEES FILED BY JUNZO AND PAUL SUZUKI	0.10	\$49.50
12/6/2016	RAR	TELEPHONE CONFERENCE REGARDING STATUS CHECK RE CONTINUANCE	0.30	\$148.50
12/6/2016	RAR	TELEPHONE CONFERENCE WITH COURTROOM ADMINISTRATOR REGARDING TELEPHONIC CONFERENCE AND COURT AVAILABILITY RE SAME	0.30	\$148.50
12/6/2016	RAR	DRAFT EMAIL RE SETTING TELEPHONIC STATUS CONFERENCE	0.10	\$49.50
12/6/2016	RAR	REVIEW STIPULATION RE TELEPHONIC CONFERENCE	0.20	\$99.00
12/6/2016	RAR	EMAIL EXCHANGES WITH COUNSEL FOR ALL PARTIES RE STIPULATION AND ORDER RE CONFERENCE	0.30	\$148.50
12/6/2016	RAR	STRATEGIZE RE CONFERENCE TO ADDRESS CONTINUANCE	0.10	\$49.50
12/6/2016	RAR	ADDRESS RULE 26 DISCLOSURES	0.30	\$148.50
12/6/2016	RAR	REVIEW RULE 26 RE DISCLOSURE REQUIREMENTS	0.20	\$99.00
12/6/2016	RAR	REVIEW AND ANALYZE COMPLAINT FOR USE IN DRAFTING INITIAL DISCLOSURES	1.10	\$544.50
12/7/2016	RAR	REVIEW STIPULATION RE TELEPHONIC CONFERENCE	0.10	\$49.50
12/7/2016	RAR	REVIEW COURT ORDER SETTING TELEPHONIC CONFERENCE	0.10	\$49.50
12/7/2016	RAR	TELEPHONE CALL TO COURT RE TELEPHONIC CONFERENCE SET FOR DECEMBER 13, 2016	0.20	\$99.00

Continued On Next Page

12/28/2016
Page: 2

12/7/2016	RAR	ADDRESS COLLECTION AND REVIEW OF RELEVANT DOCUMENTS FOR USE IN DRAFTING INITIAL DISCLOSURES; CONFER WITH COUNSEL FOR OTHER DEFENDANTS RE SAME; DRAFT INITIAL DISCLOSURES	0.90	\$445.50
12/8/2016	RAR	TELEPHONE CALLS TO AND FROM COURT CLERK RE APPEARANCE ON BEHALF OF SUZUKI ENTERPRISES PROFIT SHARING PLAN AND SET ASIDE OF DEFAULT	0.30	\$148.50
12/8/2016	RAR	STRATEGIZE RE SETTLEMENT NEGOTIATIONS WITH COUNSEL FOR PLAINTIFF	0.30	\$148.50
12/8/2016	RAR	DRAFT STIPULATION RE PAYMENT OF ATTORNEYS FEES FOR MONTH OF NOVEMBER 2016	1.00	\$495.00
12/8/2016	RAR	REVIEW EMAILS TO AND FROM COUNSEL FOR PLAINTIFF RE SETTLEMENT NEGOTIATIONS AND STIPULATION RE PAYMENT OF ATTORNEYS FEES INCURRED BY PLAN FOR NOVEMBER 2016	0.20	\$99.00
12/9/2016	RAR	FINALIZE AND FILE STIPULATION RE FEES AND ACCOMPANYING EXHIBITS	0.40	\$198.00
12/9/2016	RAR	REVIEW EMAIL REGARDING DISCLOSURE OF INSURANCE POLICIES	0.10	\$49.50
12/9/2016	RAR	ADDRESS INITIAL DISCLOSURES	0.30	\$148.50
12/9/2016	RAR	ADDRESS RESPONSE TO COMPLAINT	0.10	\$49.50
12/12/2016	RAR	EMAIL EXCHANGES WITH COUNSEL FOR CO-DEFENDANTS RE INITIAL DISCLOSURES	0.20	\$99.00
12/12/2016	RAR	REVIEW COURT ORDER GRANTING STIPULATION RE PAYMENT OF ATTORNEYS FEES	0.10	\$49.50
12/13/2016	RAR	PREPARE FOR STATUS CONFERENCE	0.30	\$148.50
12/13/2016	RAR	ATTEND TELEPHONIC STATUS CONFERENCE	0.80	\$396.00
12/13/2016	RAR	STRATEGIZE RE JURY POOL RESEARCH TO EVALUATE LAS VEGAS VERSUS RENO FOR TRIAL VENUE	0.20	\$99.00
12/13/2016	RAR	TELEPHONE CALLS AND EMAIL EXCHANGES WITH COLLEAGUES REGARDING IMPRESSIONS OF RENO VERSUS LAS VEGAS JURY POOL	1.10	\$544.50
12/13/2016	RAR	RESEARCH RESPECTIVE PROFILES OF JURY POOLS IN LAS VEGAS VERSUS RENO	0.70	\$346.50
12/14/2016	RAR	REVIEW MINUTE ORDER RE TRIAL CONTINUANCE AND RELATED DEADLINES	0.10	\$49.50
12/14/2016	RAR	BEGIN REVIEW AND ANALYSIS OF DOCUMENTS FOR USE IN DRAFTING INITIAL DISCLOSURES	1.90	\$940.50
12/14/2016	RAR	ADDRESS SETTLEMENT DISCUSSIONS	0.40	\$198.00
12/15/2016	RAR	ADDRESS UPCOMING DEADLINES, INCLUDING INITIAL DISCLOSURES AND RESPONSE TO COMPLAINT	0.40	\$198.00
12/19/2016	RAR	DRAFT STIPULATION RE LIQUIDATION OF PLAN ASSETS	0.60	\$297.00
12/19/2016	RAR	REVIEW PRELIMINARY INJUNCTION FOR USE IN DRAFTING STIPULATION AND ORDER RE LIQUIDATION OF PLAN ASSETS	0.80	\$396.00
12/19/2016	RAR	REVIEW EMAIL REGARDING STIPULATION TO LIQUIDATE PLAN; STRATEGIZE RE STIPULATION TO LIQUIDATE PLAN	0.20	\$99.00
12/19/2016	RAR	CONTINUE REVIEW OF DOCUMENTS AND PREPARATION OF INITIAL DISCLOSURES	2.90	\$1,435.50
12/19/2016	RAR	REVIEW EMAIL EXCHANGE REGARDING STIPULATION RE LIQUIDATION	0.10	\$49.50
12/20/2016	RAR	REVIEW MULTIPLE EMAILS REGARDING SETTLEMENT NEGOTIATIONS AND SUPPORTING DOCUMENTATION/CASE LAW RE SAME	0.50	\$247.50
12/20/2016	RAR	REVIEW MINUTE ORDER RE TRIAL DEADLINES	0.10	\$49.50
12/20/2016	RAR	REVIEW EMAIL FROM COUNSEL FOR PLAINTIFF RE LIQUIDATION	0.10	\$49.50

Continued On Next Page

OF PLAN ASSETS					
12/21/2016	RAR	REVIEW EMAILS WITH TRUSTEE REGARDING LIQUIDATION OF PLAN ASSETS AND ORDER RE SAME	0.20	\$99.00	
12/21/2016	RAR	REVIEW PROPOSED STIPULATION RE LIQUIDATION OF PLAN ASSETS	0.20	\$99.00	
12/21/2016	RAR	REVIEW STATUS OF SETTLEMENT NEGOTIATIONS AND DEVELOPING LEGAL ISSUES	0.30	\$148.50	
12/21/2016	RAR	REVIEW INSURANCE AND RELATED DOCUMENTS FOR USE IN DRAFTING DISCLOSURES AND PREPARATION OF DOCUMENTS DISCLOSURES	0.40	\$198.00	
12/21/2016	RAR	REVIEW RULE OF CIVIL PROCEDURE 26 AND RELATED MATERIALS RE INSURANCE AGREEMENT DISCLOSURE REQUIREMENT	0.40	\$198.00	
12/21/2016	RAR	REVIEW COMPLAINT, OTHER PLEADINGS, AND OTHER DISCLOSURES AVAILABLE FOR USE IN DRAFTING WITNESS LISTING IN INITIAL DISCLOSURES	2.10	\$1,039.50	
12/21/2016	RAR	FINALIZE AND FILE STIPULATION RE LIQUIDATION	0.30	\$148.50	
12/21/2016	RAR	REVIEW EMAIL EXCHANGES RE STIPULATION RE LIQUIDATION AND AMENDMENTS THERETO	0.20	\$99.00	
12/22/2016	RAR	ADDRESS STATUS OF SETTLEMENT AND NEGOTIATIONS	0.30	\$148.50	
12/23/2016	RAR	ASSESS STATUS OF SETTLEMENT NEGOTIATIONS TO DATE AND CONFER WITH CO-COUNSEL RE SAME	0.30	\$148.50	
12/28/2016	RAR	REVIEW STIPULATION RE TIMING OF RESPONSE TO COMPLAINT AND ASSESS NEED FOR FURTHER STIPULATION IN LIGHT OF PENDING SETTLEMENT	0.10	\$49.50	
12/28/2016	RAR	REVIEW SETTLEMENT AGREEMENT DRAFT AND EMAIL CO-COUNSEL RE SAME	0.30	\$148.50	
				Billable Hours / Fees:	25.10 \$12,424.50

Timekeeper Summary

Timekeeper RAR worked 25.10 hours at \$495.00 per hour, total \$12,424.50.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
11/30/2016	NOVEMBER 2016 WESTLAW RESEARCH	\$0.66	
12/02/2016	FILING FEE - VERIFIED PETITION FEE (MASTERCARD RAR)	\$250.00	
	Total Costs:	\$250.66	

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
12/16/2016	Check Number 4111 (Chase)	(\$2,099.50)
	Total Payments Received:	(\$2,099.50)

Prior Balance:	\$2,099.50		
Payments Received:	(\$2,099.50)	Last Payment:	12/16/2016
Current Fees:	\$12,424.50		
Advanced Costs:	\$250.66		
Administrative Cost/Late Charges:	\$0.00		
Amount to be Applied from Trust:	(\$0.00)		
TOTAL AMOUNT DUE:	<hr/> \$12,675.16		

Thank You For Your Business